

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Koetter Woodworking, Inc.  
Building 247 America Place  
Jeffersonville, Indiana 47130**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T019-7687-00071	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a wood door and venetian blind production and coating facility.

Responsible Official: Steve Williams  
Source Address: Building 247 America Place, Jeffersonville, Indiana, 47130  
Mailing Address: Same  
SIC Code: 2431, 2591  
County Location: Clark  
County Status: Nonattainment for ozone  
Attainment for all other criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under Emission Offset Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) Woodworking operations equipped with the following:
  - (a) Two (2) baghouses, identified as DC3-2 and DC7-2, for particulate control of one (1) moulder, two (2) buffers, one (1) chop saw, and one (1) sander, located in Building 247, exhausting at S/V 3-2 and 7-2, respectively.
  - (b) One (1) baghouse, identified as DC1-2, for particulate control of two (2) planers, two (2) rip saws, and one (1) chop saw, located in Building 259, exhausting at S/V 1-2.
  - (c) One (1) baghouse, identified as DC2-2, for particulate control of one (1) moulder, two (2) shapers, two (2) sanders, three (3) chop saws, two (2) double ends, one (1) table saw, one (1) band saw, one (1) multi-head shaper, one (1) panel saw, located in Building 260, exhausting at S/V 2-2.
- (2) Two (2) Louver Line flow coating operations, located in series, each exhausting to Stacks S1a and S1b, and, S2a and S2b. Each flow coating operation is capable of painting a maximum of 8,580 square feet of wood louvers per hour.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Grinding and machining operations (DC4-2, DC5-2, DC6-2, DC8-2, DC9-2, DC10-2) controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA

along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);



- (5) Any insignificant activity that has been added without a permit revision; and
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section),  
or

Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent

that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]**

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing

a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**B.27 Enhanced New Source Review [326 IAC 2]**

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The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.



## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as

defined by 326 IAC 2-7-1(34).

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.10 Compliance Schedule [326 IAC 2-7-6(3)]**

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

#### **C.13 Monitoring Methods [326 IAC 3]**

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

#### **C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

- (3) An automatic measurement was taken when the process was not operating; or
- (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:  
  
Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

**C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Stratospheric Ozone Protection**

**C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

**The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.**

Facility Description [326 IAC 2-7-5(15)]: Woodworking operations equipped with the following:

- (a) Two (2) baghouses, identified as DC3-2 and DC7-2, for particulate control of one (1) moulder, two (2) buffers, one (1) chop saw, and one (1) sander, located in Building 247, exhausting at S/V 3-2 and 7-2, respectively.
- (b) One (1) baghouse, identified as DC1-2, for particulate control of two (2) planers, two (2) rip saws, and one (1) chop saw, located in Building 259, exhausting at S/V 1-2.
- (c) One (1) baghouse, identified as DC2-2, for particulate control of one (1) moulder, two (2) shapers, two (2) sanders, three (3) chop saws, two (2) double ends, one (1) table saw, one (1) band saw, one (1) multi-head shaper, one (1) panel saw, located in Building 260, exhausting at S/V 2-2.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from DC1-2, DC2-2, DC3-2, and DC7-2 shall not exceed 5.82, 5.75, 3.44, and 1.66 pounds per hour each, respectively, when operating at process weight rates of 3375, 3312.5, 1538, and 520.81 pounds per hour each, respectively.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.2 Opacity [326 IAC 5-1]

Pursuant to CP-019-4312-00071, issued on June 15, 1995, the visible emissions from baghouse DC3-2 shall not exceed 10% opacity.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.5 Particulate Matter (PM)

Pursuant to CP-019-4312-00071, issued on June 15, 1995, for DC3-2, and pursuant to this permit for DC1-2, DC2-2, and DC7-2, the baghouses for PM control shall be in operation at all times when the woodworking processes are in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of each baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.



- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### **D.1.7 Baghouse Inspections**

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### **D.1.8 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.9 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of each baghouse stack exhaust.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY CONDITIONS

**The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.**

Facility Description [326 IAC 2-7-5(15)]: Two (2) Louver Line flow coating operations, located in series, each exhausting to Stacks S1a and S1b, and, S2a and S2b. Each flow coating operation is capable of painting a maximum of 8,580 square feet of wood louvers per hour.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Emission Offset Minor Limit [326 IAC 2-3]

Pursuant to CP-019-9959-00071, issued on December 28, 1998, the total volatile organic compound input usage from the wood louver's flow coating operations shall be limited to 8.25 tons per month. This usage limit is required to limit the potential to emit of VOC to less than 99 tons per year. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to CP-019-9959-00071, issued on December 28, 1998, and 326 IAC 6-3 (PM Emission Limitations for Process Operations), the allowable PM emissions from the wood louver flow coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-2-12]

Pursuant to CP-019-9959-00071, issued on December 28, 1998, and 326 IAC 8-2-12 (Surface Coating Emission Limitations for Wood Furniture and Cabinet Coating), the surface coatings applied to wood furniture and/or wood furnishings shall utilize one or more of the following application methods:

- Airless Spray Application
- Air-Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application
- High Volume Low Pressure HVLP
- Aerosol Spray Cans

High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

#### D.2.4 Hazardous Air Pollutant (HAP) [326 IAC 2-1-3.4]

Pursuant to CP-019-9959-00071, issued on December 28, 1998, the wood louver flow coating operations are subject to 326 IAC 2-1-3.4 (New Source Toxic Control Rule) and shall comply with the following conditions by June 10, 1999:

- (a) Use compliant finishing materials in which all stains have a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.

- (b) Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; and
- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

#### **D.2.5 Work Practice Standards**

Pursuant to CP-019-9959-00071, issued on December 28, 1998, the Permittee of the wood louver flow coating operations shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date as part of the requirements of 326 IAC 2-1-3.4.

The work practice implementation plan must define environmentally desirable work practices for the coating operation and at a minimum address each of the following work practice standards:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Line cleaning.
- (h) Gun cleaning.
- (i) Washoff operations.
- (j) Formulation assessment plan for finishing operations.

#### **D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### **Compliance Determination Requirements**

#### **D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)]**

Pursuant to CP-019-9959-00071, issued on December 28, 1998, the Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.2.1, D.2.2, and D.2.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### **D.2.8 Volatile Organic Compounds (VOC)**

Pursuant to CP-019-9959-00071, issued on December 28, 1998, compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### **D.2.9 VOC Emissions**

Pursuant to CP-019-9959-00071, issued on December 28, 1998, compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.2.10 Compliance Monitoring Requirements**

- (a) The requirement from CP-019-9959-00071, issued on December 28, 1998, Condition C.9 (a), listing a noticeable change in overspray emission as an indicator for compliance determination, is not applicable because IDEM, OAM has determined that such emission units with low PM emission rates do not warrant compliance monitoring. The wood louver flow coating operations have 100% transfer efficiency as determined by the method of application and therefore, have no applicable compliance

monitoring requirements.

- (b) Pursuant to CP-019-9959-00071, issued on December 28, 1998, the Permittee shall demonstrate compliance using compliant coatings pursuant to 326 IAC 2-1-3.4 and according to the following criteria:
- (1) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 pound VHAP/pound solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
  - (2) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 pound VHAP/pound solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
  - (3) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 pound VHAP/pound solids and a thinner containing no more than 3.0 percent VHAP by weight.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.2.11 Record Keeping Requirements**

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Pursuant to CP-019-9959-00071, issued on December 28, 1998, the Permittee shall:

- (a) Document compliance with Conditions D.2.1 and D.2.4 (HAP Emission Limitations) by maintaining records in accordance with (1) through (5) below:
- (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each finishing material, thinner, contact adhesive and strippable coating used.
  - (4) The monthly VOC emission records in tons of VOC per month from the louver flow coating operation.
  - (5) The VHAP content in weight percent of each thinner used.

Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VOC and VHAP usage limits established in Conditions D.2.1 and D.2.4.

- (b) Document compliance with Condition D.2.5, by maintaining records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.2.12 Reporting Requirements**

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Pursuant to CP-019-9959-00071, issued on December 28, 1998, the Permittee shall submit:

- (a) A VOC Quarterly Report of monthly VOC emissions to demonstrate compliance with the limitations required by Condition D.2.1 within thirty (30) days following each quarter.
- (b) An Initial Compliance Report to document compliance with Condition D.2.4 and the Certification Form, within sixty (60) days following the compliance date of June 1, 1999. The Initial Compliance Report

shall consist of data for the month of June 1999.

- (c) A semi-annual Continuous Compliance Report to document compliance with Conditions D.2.4 and D.2.10(b) and the Certification Form, within thirty (30) days after the end of the six (6) month reporting period:
  - (1) The first semi-annual Continuous Compliance Report shall include the period from June 1, 1999 through December 31, 1999.
  - (2) Starting January 1, 2000, the semi-annual Continuous Compliance Report shall be submitted on a calendar year basis with the reporting periods ending June 30 and December 31.
- (d) The reports required in (a), (b), and (c) of this condition to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

## SECTION D.3

## FACILITY OPERATION CONDITIONS- Insignificant Activities

**The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.**

Facility Description [326 IAC 2-7-5(15)] and Insignificant Activities [326 IAC 2-7-1(21)]:

Grinding and machining operations (DC4-2, DC5-2, DC6-2, DC8-2, DC9-2, DC10-2) controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour (DC6-2, DC9-2, and DC10-2) shall not exceed 0.551 pounds per hour.

#### D.3.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from DC4-2, DC5-2, and DC8-2, shall not exceed 1.48 pounds per hour each for DC4-2 and DC5-2, and 1.05 pounds per hour for DC8-2, when operating at process weight rates of 437.5 pounds per hour each for DC4-2 and DC5-2, and 260 pounds per hour for DC8-2.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### Compliance Determination Requirement

#### D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.3.4 Particulate Matter (PM)

In order to ensure compliance with Conditions D.3.1 and D.3.2, the baghouses for PM control, DC4-2, DC5-2, DC6-2, DC8-2, DC9-2, DC10-2, shall be in operation at all times when the woodworking processes are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Koetter Woodworking, Inc.  
Source Address: Building 247 America Place, Jeffersonville Indiana 47130  
Mailing Address: Same  
Part 70 Permit No.: T019-7687-00071

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Koetter Woodworking, Inc.  
Source Address: Building 247 America Place, Jeffersonville Indiana 47130  
Mailing Address: Same  
Part 70 Permit No.: T019-7687-00071

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)  
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)  
C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

**Page 2 of 2**



Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL REPORT FORM**  
For VOC and VHAPs usage

Source Name: Koetter Woodworking, Inc.  
Source Address: Building 247 America Place, Jeffersonville, Indiana 47130  
Mailing Address: Same  
Part 70 Permit No.: T019-7687-00071  
Source/Facility: Louver Line - Two (2) Flow Coating Operations  
Pollutant: VOC and VHAPs - State MACT (326 IAC 2-1-3.4)  
Limits: (1) Finishing stains used have a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.  
(2) Other finishing materials ( washcoats, sealers, topcoats, basecoats and enamels) used shall have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied.  
(3) Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight.  
(4) All other thinners have a ten percent (10.0%) maximum VHAP content by weight; and  
(5) Strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

YEAR: \_\_\_\_\_

Month	Finishing Stains ( lb VHAP/lb Solid)	Washcoats, sealers, topcoats, basecoats, enamels ( lb VHAP/ lb Solid)	Thinners (on site formulation) (% by weight)	All other Thinner mixtures (% by weight)	Strippable material ( lb VOC/ lb Solid)	Flow Coater coating (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Koetter Woodworking, Inc.  
Source Address: Building 247 America Place, Jeffersonville, Indiana 47130  
Mailing Address: Same  
Part 70 Permit No.: T019-7687-00071  
Facility: Louver Line- Two (2) Flow Coating Operations  
Parameter: VOC- Limit to avoid Emission Offset (326 IAC 2-3)  
Limit: 8.25 tons VOC per month

QUARTER/YEAR: \_\_\_\_\_

Month	VOC Input Usage (tons/month)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Koetter Woodworking, Inc.  
Source Address: Building 247 America Place, Jeffersonville, Indiana 47130  
Mailing Address: Same  
Part 70 Permit No.: T019-7687-00071

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please check (T) the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management

## Office of Air Management

### Addendum to the Technical Support Document for Part 70 Operating Permit

<b>Source Name:</b>	<b>Koetter Woodworking, Inc.</b>
<b>Source Location:</b>	<b>Building 247 America Place, Jeffersonville, Indiana 47130</b>
<b>County:</b>	<b>Clark</b>
<b>SIC Code:</b>	<b>2431, 2591</b>
<b>Operation Permit No.:</b>	<b>T019-7687-00071</b>
<b>Permit Reviewer:</b>	<b>Melissa Groch</b>

On May 28, 1999, the Office of Air Management (OAM) had a notice published in the Evening News, Jeffersonville, Indiana, stating that Koetter Woodworking, Inc., had applied for a Part 70 Operating Permit to operate a wood door and venetian blind production and coating facility. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 12 and 14, 1999, the following comments were received via telephone from Jeff Korman of Bruce Carter Associates, L.L.C., on behalf of Koetter Woodworking, Inc., regarding the proposed Part 70 permit for Koetter Woodworking, Inc., (deleted or changed language appears as ~~strikeouts~~, new language is **bolded**).

#### **Comment 1:**

Koetter Woodworking, Inc., would like to change the responsible official from Sam Smith to Steve Williams.

#### **Response to Comment 1:**

As a result of this comment, the first line in Condition A.1, General Information, has been changed to read as follows:

Responsible Official: ~~Sam Smith~~ **Steve Williams**

#### **Comment 2:**

Koetter Woodworking, Inc., would like to specify that each flowcoater has two stacks.

#### **Response to Comment 2:**

As a result of this comment, Condition A.2, Emission Units and Pollution Control Equipment Summary, item (2) has been changed to read as follows:

Two (2) Louver Line flow coating operations, located in series, each exhausting to ~~separate~~ **Stacks S1a and S1b, and, S2a and S2b**. Each flow coating operation is capable of painting a maximum of 8,580 square feet of wood louvers per hour.

This change is also reflected in the description box of Section D.2.

Since the OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Let the above comment serve as a record for this documentation. Therefore, no language change as a result of the above comment has been recorded in the TSD under the section Permitted Emission Units and Pollution Control Equipment.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

#### Source Background and Description

**Source Name:** Koetter Woodworking, Inc.  
**Source Location:** Building 247 America Place, Jeffersonville, Indiana 47130  
**County:** Clark  
**SIC Code:** 2431, 2591  
**Operation Permit No.:** T019-7687-00071  
**Permit Reviewer:** Melissa Groch

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Koetter Woodworking, Inc., relating to the operation of a wood door and venetian blind production and coating facility.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One moulder, two buffers, and one chop saw equipped with one (1) baghouse, identified as DC3-2, for particulate control, located in Building 247, and exhausting at S/V 3-2.
- (2) Two (2) Louver Line flow coating operations, located in series, each exhausting to separate Stacks S1 and S2. Each flow coating operation is capable of painting a maximum of 8,580 square feet of wood louvers per hour.

#### Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted woodworking operations:

- (1) One (1) sander, and three (3) chop saws, equipped with three (3) baghouses, identified as DC7-2, DC9-2, and DC10-2, for particulate control, all located in Building 247, and exhausting at S/V 7-2, 9-2, and 10-2, respectively.
- (2) Two (2) baghouses, identified as DC1-2, and DC8-2, for particulate control of two (2) planers, two (2) rip saws, and four (4) chop saws, all located in Building 259, and exhausting at S/V 1-2 and 8-2, respectively.
- (3) Four (4) baghouses, identified as DC2-2, DC4-2, DC5-2, and DC6-2, for particulate control of one (1) moulder, two (2) shapers, two (2) sanders, three (3) chop saws, three (3) double ends, one (1) table saw, one (1) band saw, one (1) multi-head shaper, one (1) panel saw, one (1) double saw, one (1) vacuum table with sander, and one (1) stroke sander, all located in Building 260, and exhausting at S/V 2-2, 4-2, 5-2, and 6-2, respectively.

#### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (a) Eleven (11) Rezner space heaters, rated at 0.165 MMBtu per hour each, located in Building 247.
  - (b) One (1) Janitrol space heater, rated at 0.25 MMBtu per hour, located in Building 247.

- (c) One (1) Luxaire space heater, rated at 0.15 MMBtu per hour, located in Building 247.
- (d) Four (4) Sterling space heaters, rated at 0.2 MMBtu per hour each, located in Building 259.
- (e) Four (4) Dayton space heaters, rated at 0.09 MMBtu per hour each, located in Building 260.
- (f) Ten (10) Dayton space heaters, rated at 0.03 MMBtu per hour each, located in Building 260.
- (2) Water Based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (3) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (4) Paved or unpaved roads and parking lots with public access.
- (5) Grinding and machining operations (DC4-2, DC5-2, DC6-2, DC8-2, DC9-2, and DC10-2) controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) CP 019-4312-00071, issued June 15, 1995;
- (2) OP 019-4312-00071, issued July 21, 1995; and
- (3) CP 019-9959-00071, issued December 28, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (1) CP 019-4312-00071, issued June 15, 1995:

#### Surface Coating

Condition 4: That pursuant to 326 IAC 8-2-12, the wood venetian blinds' surface coating shall be applied using one of the applicators listed in the rule. Air-assisted airless type applicator is an approved applicator.

Condition 5: That the total volatile organic compounds input usage from coating wood venetian blinds shall be limited to 8.25 tons per month. Satisfaction of this condition and all other operation conditions shall render the Emissions Offset Rule 326 IAC 2-3 not applicable in this case.

Condition 6: That a log of information necessary to document compliance with condition 5 shall be maintained. These records shall be kept for at least the past 24 month period and made available upon request to the Office of Air management.

Condition 7(b): That particulate matter emissions from the spray booths shall be considered in compliance with 326 IAC 6-3 provided that; b) source PM emissions do not exceed the following allowable PM emissions of 0.51 pounds per hour for the surface coating booths.

Condition 8: That the particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not: a) visibly detected at the exhaust, or b) accumulated on the rooftops or on the ground.

Reason not incorporated:

The two (2) Louver Line flow coating operations permitted under CP 019-9959-00071, issued December

28, 1998, shall replace the two (2) spray booths permitted under CP 019-4312-00071, issued on June 15, 1995, and shall supersede Operation Conditions 4, 5, 6, 7(b) for surface coating, and 8 from CP 019-4312.

### **Woodworking Operations**

Condition 7(b): That particulate matter emissions from the woodworking operations shall be considered in compliance with 326 IAC 6-3 provided that; b) source PM emissions do not exceed the following allowable PM emissions of 4.10 pounds per hour.

Reason not incorporated:

The allowable has changed for this operation as a result of a different throughput rate submitted in the Part 70 application for the woodworking operations.

- (2) CP 019-9959-00071, issued December 28, 1998:

Operation Condition, C.5, of the final permit had been revised to include the opacity regulations under 326 IAC 5. Part (a)(1) of this condition included the opacity restriction not to exceed forty (40%) percent in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

Reason not incorporated:

Pursuant to 326 IAC 5-1-4, opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period for sources located in Clark County, and specifically, Jeffersonville Township.

Operation Condition, C.9(a), states that the PM overspray from the wood louver flow coating operations shall be in compliance with the PM emission limitations contained in Condition C.5 provided that a noticeable change in overspray emission is not observed. If no overspray emission is usually observed, evidence of any overspray emission will be considered a noticeable change.

Reason not incorporated:

This requirement listing a noticeable change in overspray emission as an indicator for compliance determination, is not applicable because IDEM, OAM has determined that such emission units with low PM emission rates do not warrant compliance monitoring. The wood louver flow coating operations have 100% transfer efficiency as determined by the method of application and therefore, have no applicable compliance monitoring requirements.

### **Enforcement Issue**

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information received on December 29, 1998, makes the Part 70 permit application administratively complete.



A notice of completeness letter was mailed to the source on June 18, 1997.

Information used in this review was derived from the application and from additional information submitted by the applicant, unless otherwise stated.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations, pages 1 and 2 of 2.

## Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 100
SO <sub>2</sub>	zero
VOC	greater than 250
CO	zero
NO <sub>x</sub>	zero

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Methyl Ethyl Ketone	greater than 25
Toluene	greater than 25
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOC and PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the PM and HAPs emission data submitted by the source with the Part 70 permit application and their VOC quarterly report year end total for 1998.

Pollutant	Actual Emissions (tons/year)
PM	0.05
PM-10	0.00
SO <sub>2</sub>	0.00
VOC	29.91
CO	0.00
NO <sub>x</sub>	0.00

HAP combination	32
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### County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM	attainment
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	nonattainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as moderate nonattainment for ozone.

### Federal Rule Applicability

- (a) Pursuant to CP 019-4312-00071, there are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) Pursuant to CP 019-9959-00071, issued on December 28, 1998, there are no New Source Performance Standards (326 IAC 12) applicable to the flow coating operations.
- (c) Pursuant to CP 019-9959-00071, issued on December 28, 1998, there are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) applicable to the flow coating operations. The standard industrial classification code, 2431, for this operation is not listed as wood furniture, and does not qualify it as wood furniture component.

### State Rule Applicability - Entire Source

#### 326 IAC 2-3 (Emission Offset Minor Limit)

Pursuant to CP-019-9959-00071, issued on December 28, 1998, the total volatile organic compound input usage from the wood louver's flow coating operations shall be limited to 8.25 tons per month. This usage limit is required to limit the potential to emit of VOC to less than 99 tons per year. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

## State Rule Applicability - Individual Facilities

### Woodworking Operations

#### 326 IAC 6-3-2 (Process Operations)

Pursuant to CP 019-4312-00071, issued June 15, 1995, the particulate matter (PM) from the woodworking processes associated with baghouse DC3-2, and pursuant to this permit, the particulate matter (PM) from the woodworking processes associated with baghouses DC1-2, DC2-2, DC4-2, DC5-2, DC7-2, and DC8-2 shall not exceed the following allowables in pounds per hour:

Collector	Process Weight Rate in lbs/hr	Allowable in lbs/hr
DC3-2	1538	3.44
DC1-2	3375.5	5.82
DC2-2	3312.5	5.75
DC4-2	437.5	1.48
DC5-2	437.5	1.48
DC7-2	520.81	1.66
DC8-2	260	1.05

The pounds per hour limitation for each collector was calculated as follows:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Since the potential particulate matter emissions from the collectors listed above before controls is greater than each of their allowable emission rate, then the baghouses (with efficiencies rated at 99.99%) must be operating at all times during the operation of the woodworking processes. Since their pound per hour potential emission rate after controls is less than each of their allowable emission rate in pounds per hour as shown in the table above, then these woodworking operations are in compliance with 326 IAC 6-3-2.

Pursuant to CP 019-4312-00071, issued June 15, 1995, baghouse DC3-2 shall be in operation at all times the woodworking is in operation in order to comply with this limit.

Baghouses DC1-2, DC2-2, DC4-2, DC5-2, DC7-2, and DC8-2 shall be in operation at all times the woodworking is in operation, in order to comply with this limit.

#### 326 IAC 6-3-2(c) (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour)

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour (DC6-2, DC9-2, and DC10-2) shall not exceed 0.551 pounds per hour.

Collector	Process Weight Rate in lbs/hr	Allowable in lbs/hr
DC6-2	9.38	0.551
DC9-2	78.09	0.551
DC10-2	52.06	0.551

Since the potential particulate matter emissions from the collectors listed above before controls is greater than each of their allowable emission rate, 0.551 pounds per hour, then the baghouses (with efficiencies rated at

99.9%) must be operating at all times during the operation of the woodworking processes. Since their pound per hour potential emission rate after controls is less than each of their allowable emission rate in pounds per hour as shown in the table above, then these insignificant woodworking operations are in compliance with 326 IAC 6-3-2.

Baghouses DC6-2, DC9-2, and DC10-2 shall be in operation at all times the woodworking processes are in operation, in order to comply with this limit.

**326 IAC 5-1 (Opacity)**

Pursuant to CP-019-4312-00071, issued on June 15, 1995, the visible emissions from the woodworking processes associated with baghouse DC3-2 shall not exceed 10% opacity.

**Flow Coating Operations**

**326 IAC 2-1-3.4 (New Source Toxic Control)**

Pursuant to CP-019-9959-00071, issued on December 28, 1998, the wood louver flow coating operations are subject to 326 IAC 2-1-3.4 (New Source Toxic Control Rule) and shall comply with the following conditions by June 10, 1999:

- (a) Use compliant finishing materials in which all stains have a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.
- (b) Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; and
- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

The New Source Toxics Control rule requires any new or reconstructed major source of hazardous air pollutants (HAPs) for which there is no applicable NESHAP shall be required to make the maximum achievable control technology (MACT) determination on a case-by-case basis. The wood louver flow coating operation is not subject to 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) because the wood louvers are not a furniture or furniture component as defined by the rule. Although a wood louver does not meet the definition of a furniture or furniture component as defined by 40 CFR 63, Subpart JJ, the wood louver operation is similar to a wood furniture operation, and therefore the requirements of 40 CFR 63, Subpart JJ shall be applied as state MACT. The state MACT shall meet the emission limitations for new and reconstructed sources required by 40 CFR 63, Subpart JJ through the use of compliant coatings.

**326 IAC 2-3 (Emission Offset Minor Limit)**

Pursuant to CP-019-9959-00071, issued on December 28, 1998, the total volatile organic compound input usage from the wood louver's flow coating operations shall be limited to 8.25 tons per month. This usage limit is required to limit the potential to emit of VOC to less than 99 tons per year. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

**326 IAC 6-3 (Particulate Matter Emission Limitations)**

Pursuant to CP-019-9959-00071, issued on December 28, 1998, and 326 IAC 6-3 (PM Emission Limitations for Process Operations), the allowable PM emissions from the wood louver flow coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**326 IAC 8-2-12 (Surface Coating Emission Limitations for Wood Furniture and Cabinet Coating)**

Pursuant to CP-019-9959-00071, issued on December 28, 1998, and 326 IAC 8-2-12 (Surface Coating Emission Limitations for Wood Furniture and Cabinet Coating), the surface coatings applied to wood furniture and/or wood furnishings shall utilize one or more of the following application methods:

- Airless Spray Application
- Air-Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application
- High Volume Low Pressure HVLP
- Aerosol Spray Cans

High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

This source is subject to 326 IAC 8-2-12 because a wood louver is a wood furnishing. Although the wood louvers (blinds) are not wood furniture as defined in the federal NESHAP (40 CFR 63, Subpart JJ), the state rule applies to both wood furniture *and* wood furnishings. A furnishing is defined in *The American Heritage College Dictionary* as "equipment that is necessary, useful, or desirable". The wood louvers meet the definition of a furnishing and therefore is subject to the requirements of 326 IAC 8-2-12. Pursuant to this rule, the owner/operator shall apply all coating material, with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, using one (1) of the application methods listed in the rule. The coating operations at this source include two (2) flow coating operations. The flow coaters are categorized under the roller coat system, and, therefore, are in compliance with this rule.

#### 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

The source is not subject to the provisions of 326 IAC 8-7 because the source is listed as exempt from this rule under subsection (b) in that it is subject to the provisions of 326 IAC 8-2 (Surface Coating Emission Limitations). It also is not subject to the certification, record keeping, and reporting requirements of this rule because the aggregate potential emissions from this source are greater than 100 tons per year.

#### 326 IAC 8-11 (Wood Furniture VOC Coating Limitations)

This source is not subject to 326 IAC 8-11 because even though the source is located in Clark County, the wood louvers are not classified by any of the Standard Industrial Classification (SIC) codes specified in the rule.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The woodworking baghouses have applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emissions notations of each stack (S/V 1-2 through 10-2) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
  - (b) An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

These monitoring conditions are necessary because each baghouse (DC1-2 through 10-2) for the woodworking processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

2. Pursuant to CP-019-9959-00071, issued on December 28, 1998, the surface coating operations have applicable compliance monitoring conditions as specified below:
  - (a) The PM overspray from the wood louver flow coating operations shall be in compliance with the PM emission limitations provided that a noticeable change in overspray emission is not observed. If no overspray emission is usually observed, evidence of any overspray emission will be considered a noticeable change
  - (b) The Permittee shall demonstrate compliance using compliant coatings pursuant to 326 IAC 2-1-3.4 and according to the following criteria:
    - (1) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 pound VHAP/pound solids ,as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
    - (2) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 pound VHAP/pound solids, as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
    - (3) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 pound VHAP/pound solids and a thinner containing no more than 3.0 percent VHAP by weight.

## Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

The surface coating operation has the potential to emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act. The hazardous air pollutants have been controlled/limited pursuant to 326 IAC 2-1-3.4 (New Source Toxic Control Rule) as discussed in the *State Rule*

*Applicability* section of this Technical Support Document.

## **Conclusion**

The operation of this wood door and venetian blind production and coating facility shall be subject to the conditions of the attached proposed Part 70 Permit No. T019-7687-00071.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Koetter Woodworking**  
**Address City IN Zip: Building 247 America Place, Jeffersonville, Indiana**  
**Title V: 019-7687**  
**Pit ID: 00071**  
**Reviewer: Melissa Groch**

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Lb VOC /gal solids
<b>Primer</b>														
320 White Spray Primer	10.25	49.78%	0.0%	49.8%	0.0%	27.73%	0.29750	8.580	5.10	5.10	13.02	312.58	57.05	18.40
<b>Stain Sealers</b>														
311 W/W Lac T/C-55	7.75	75.63%	0.0%	75.6%	0.0%	17.26%	0.29750	8.580	5.86	5.86	14.96	359.07	65.53	33.96
344 Cherry Stain	7.00	94.58%	0.0%	94.6%	0.0%	2.24%	0.29750	8.580	6.62	6.62	16.90	405.59	74.02	295.56
344 Oak Stain	7.00	94.35%	0.0%	94.4%	0.0%	2.74%	0.29750	8.580	6.60	6.60	16.86	404.60	73.84	241.04
344 Golden Oak Stain	7.00	93.48%	0.0%	93.5%	0.0%	3.17%	0.29750	8.580	6.54	6.54	16.70	400.87	73.16	206.42
435 Pecan Stain	7.08	92.40%	0.0%	92.4%	0.0%	3.66%	0.29750	8.580	6.54	6.54	16.70	400.77	73.14	178.74
320 Bleached White B/C	7.75	74.42%	0.0%	74.4%	0.0%	15.00%	0.29750	8.580	5.77	5.77	14.72	353.33	64.48	38.45
<b>Topcoat</b>														
325 Candlelight Enamel	8.25	62.02%	0.0%	62.0%	0.0%	22.22%	0.73500	8.580	5.12	5.12	32.27	774.41	141.33	23.03
325 Alabaster Enamel	8.33	65.77%	0.0%	65.8%	0.0%	22.28%	0.73500	8.580	5.48	5.48	34.55	829.20	151.33	24.59
325 Cotton White Enamel	8.25	66.11%	0.0%	66.1%	0.0%	22.21%	0.73500	8.580	5.45	5.45	34.40	825.48	150.65	24.56
325 Wh Spray Enamel	8.25	66.10%	0.0%	66.1%	0.0%	22.21%	0.73500	8.580	5.45	5.45	34.39	825.36	150.63	24.55
325 102 Arctic Ice Enamel	8.25	66.10%	0.0%	66.1%	0.0%	22.21%	0.73500	8.580	5.45	5.45	34.39	825.36	150.63	24.55
<b>Additive</b>														
Gloss Additive	7.91	40.00%	0.0%	40.0%	0.0%	54.29%	0.08750	8.580	3.16	3.16	2.38	57.01	10.40	5.83
White Tint	13.82	33.81%	0.0%	33.8%	0.0%	32.57%	0.08750	8.580	4.67	4.67	3.51	84.19	15.36	14.35
<b>Reformulated Coatings</b>														
Primer	10.25	49.70%	1.5%	48.2%	0.0%	0.29%	0.29750	8.580	4.94	4.94	12.61	302.66	55.24	1703.62
Topcoat	8.25	64.00%	0.08%	63.9%	0.0%	0.24%	0.73500	8.580	5.27	5.27	33.26	798.14	145.66	2197.25
<b>Solvents</b>														
Butyl Acetate Solvent	7.33	100.00%	0.0%	100.0%	0.0%	0.00%	0.33250	8.580	7.33	7.33	20.91	501.87	91.59	ERR
MEK Solvent #2	6.75	100.00%	0.0%	100.0%	0.0%	0.00%	0.33250	8.580	6.75	6.75	19.26	462.16	84.34	ERR
360 Lacquer Thinner	6.58	100.00%	0.0%	100.0%	0.0%	0.00%	0.33250	8.580	6.58	6.58	18.77	450.52	82.22	ERR

State Potential Emissions

Add worst case coating to all solvents

99.4

2385

435

## METHODOLOGY:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Since the transfer efficiency for the flowcoaters is 100%, there are no PM emissions considered in the calculations.

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used





**Appendix A: Emissions Calculations  
Woodworking Emissions**

Page 2 of 2 TSD App A

**Company Name:** Koetter Woodworking, Inc.  
**Address City IN Zip:** Building 247 America Place, Jeffersonville, IN 47106  
**County:** Clark  
**Permit #:** T019-7687  
**Plant ID:** 00071  
**Reviewer:** Melissa Groch

**Potential Emissions**

Building	Collector	ACFM	Through put	Outlet Grain Loading gr/ascf	Potential After Controls	Potential Before Controls	Allowable Each
259	DC1-2	6000	3375.00 lbs/hr	0.002139	0.11 lbs/hr	1100.06 lbs/hr	5.82 lbs/hr
260	DC2-2	18000	3312.50 lbs/hr	0.001231	0.19 lbs/hr	1899.26 lbs/hr	5.75 lbs/hr
247	DC3-2	18000	1538.00 lbs/hr	0.000010	0.0015 lbs/hr	14.97 lbs/hr	3.44 lbs/hr
260	DC4-2	3000	437.50 lbs/hr	0.001400	0.0360 lbs/hr	360.00 lbs/hr	1.48 lbs/hr
260	DC5-2	1500	437.50 lbs/hr	0.000049	0.0006 lbs/hr	6.25 lbs/hr	1.48 lbs/hr
260	DC6-2	1500	9.38 lbs/hr	0.000010	0.0001 lbs/hr	1.25 lbs/hr	0.551 lbs/hr*
247	DC7-2	18000	520.81 lbs/hr	0.000422	0.0651 lbs/hr	651.09 lbs/hr	1.66 lbs/hr
259	DC8-2	3000	260.00 lbs/hr	0.000422	0.0109 lbs/hr	108.51 lbs/hr	1.05 lbs/hr
247	DC9-2	1500	78.09 lbs/hr	0.000248	0.0032 lbs/hr	31.89 lbs/hr	0.551 lbs/hr*
247	DC10-2	1500	52.06 lbs/hr	0.000165	0.0021 lbs/hr	21.21 lbs/hr	0.551 lbs/hr*
Total:			10021 lbs/hr		0.4194 lbs/hr	4194.48 lbs/hr	

Total Throughput of Wood: 10021 lbs/hr      After Control Emissions: (gr/acf)(acf/min)(60 min/hr)(lb/7000 gr) = *see above*  
 PM control equipment: Baghouse  
 Control Efficiency: 99.99% for each      Before Control Emissions: (lbs/hr) / (1-control efficiency) = *see above*

**Allowable Emissions**

Wood throughput: (lbs wood/hr)(ton/2000 lb) = P in tons per hour

326 IAC 6-3-2 (Process Operations - Particulate emissions limitations)

$$E = 4.10P^{0.67} \quad \text{Where } E = \text{emissions in lbs/hr}$$

$$E = (4.10)(\text{wood throughput}^{0.67}) \quad \text{P = process weight rate in tons/hr}$$

Since the pounds per hour potential after controls for each baghouse is less than each of their individual allowable emission rates in pounds per hour, the woodworking operations are in compliance with 326 IAC 6-3-2.

\* Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour (DC6-2, DC9-2, and DC10-2) shall not exceed 0.551 pounds per hour.

7687calc2.WK4